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12 Attorneys for Plaintiff  
13 BLUE CROSS AND BLUE SHIELD ASSOCIATION

14  
15 UNITED STATES DISTRICT COURT  
16  
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA

18 BLUE CROSS AND BLUE SHIELD  
19 ASSOCIATION, an Illinois not-for-profit  
20 corporation,

21 Plaintiff,

22 v.

23 DIGI REAL ESTATE FOUNDATION, et  
24 al.,

25 Defendants.

No. C 07 5009 RS

26 **STIPULATION AND ~~PROPOSED~~**  
27 **ORDER CONTINUING CASE**  
28 **MANAGEMENT CONFERENCE**

Action Filed: September 27, 2008  
Trial Date: None

29 **STIPULATION**

30 WHEREAS, the Initial Case Management Conference in this action is currently set for  
31 Wednesday, January 16, 2008, at 2:30 p.m.;

32 WHEREAS, Plaintiff Blue Cross and Blue Shield Association has been engaged in  
33 settlement discussions with the named Defendants (the "Digi Real Estate Defendants") against  
34 whom it has brought its First through Fifth Claims in its Complaint in this action—and who are  
35 the relevant stakeholders for its Sixth Claim in its complaint in this action, because they are the  
36 owners of the Internet domain-name registrations against whom that in rem claim is brought;

37 WHEREAS, Plaintiff Blue Cross and Blue Shield Association and the Digi Real Estate  
38 Defendants believe that having additional time before having to complete and file the Joint Case

1 Management Statement and appear at the Initial Case Management Conference would allow them  
2 to concentrate on their settlement discussions—and may lead to resolution of the First through  
3 Sixth Claims in the Complaint in this action before the Initial Case Management Conference;

4 WHEREAS, Plaintiff Blue Cross and Blue Shield Association has been engaged in  
5 settlement discussions with the relevant non-party stakeholders (the “DigiMedia Stakeholders”)  
6 for its Seventh Claim in its complaint in this action, who are the owners of the Internet domain-  
7 name registrations against whom that in rem claim is brought;

8 WHEREAS, Plaintiff Blue Cross and Blue Shield Association believes that having  
9 additional time before having to complete and file the Joint Case Management Statement and  
10 appear at the Initial Case Management Conference would allow it to concentrate on its settlement  
11 discussions with the DigiMedia Stakeholders—and may lead to resolution of the Seventh Claim  
12 in the Complaint in this action before the Initial Case Management Conference;

13 THEREFORE, the Parties in this action, through their counsel of record, hereby stipulate  
14 that the Initial Case Management Conference in this action be continued for 60 days are such  
15 other date that may be available and as may be set by the Court—with any Federal Rule 26 or  
16 Local Rule 16-9 deadlines triggered by the Initial Case Management Conference being re-set in  
17 line with the new, continued date.

18 DATED: January 8, 2008

HANSON BRIDGETT MARCUS  
VLACHOS & RUDY, LLP

20 By: /s/

21 SUSAN G. O’NEILL  
22 Attorneys for Plaintiff  
BLUE CROSS AND BLUE SHIELD  
ASSOCIATION

23 DATED: January 8, 2008

NEWMAN AND NEWMAN

25 By: /s/

26 DEREK A. NEWMAN  
27 Attorneys for Defendants  
DIGI REAL ESTATE FOUNDATION  
KANWARDEEP JOHAR  
28 OLEKSIY KOVYRIN  
GALT NETWORKS, INC.

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